

## **REMARKS/ARGUMENTS**

In response to the Examiner's Advisory Action of May 13, 2009 the Applicant respectfully submits the following Remarks.

### ***Regarding 11***

It is respectfully submitted that the subject matter of pending independent claim 1, and claims 3, 5, 6 and 10 dependent therefrom, is not disclosed by Silverbrook, for at least the following reasons.

The Applicant disagrees with the Examiner's contention that the leveraged movement disclosed by Silverbrook "causes the piston to be displaced in a rectilinear fashion", because it is clear that the piston 9 would tilt in accordance with the tilt of the lever arm 17 when the lever arm is leveraged around the fulcrum 8 (see col. 6, lines 15-44 and Figs. 1 and 2), and one of ordinary skill in the art understands that such tilting can not be considered as rectilinear movement relative to the substrate, as is required by the claimed invention.


Having said this, the Applicant respectfully submits that the claimed invention is further distinguished from Silverbrook because the lever arm disclosed by Silverbrook is not "of a material having a coefficient of thermal expansion" such that the lever arm "is capable of substantially rectilinear expansion and contraction relative to the substrate when heated and subsequently cooled", as is required by the claimed invention.

This is because, Silverbrook specifically discloses that the lever arm and the associated components 9,16,19,24 are formed of CoNiFe (see col., 11, line 58-col. 12, line 8), which one of ordinary skill in the art understands has a low coefficient of thermal expansion (see, for example, US Patent Nos. 7,092,208 and 7,061,726, and US Application Publication No. 20060221498). Therefore, the lever arm of Silverbrook would not undergo thermal expansion and contraction as required by the claimed invention.

Furthermore, Silverbrook specifically discloses that the magnetic interaction between the solenoid 2 and soft magnetic plate 5 of the lever arm causes the leveraged movement of the lever arm (see col. 6, lines 5-54), not thermal expansion and contraction, as is required by the claimed invention.

It is respectfully submitted that all of the Examiner's rejections have been traversed. Accordingly, it is submitted that the present application is in condition for allowance and reconsideration of the present application is respectfully requested.

Very respectfully,

Applicant/s:   

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